



October 1, 2004

Reply to Attn of: Office of the General Counsel

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance by NASA Employees at a Reception Sponsored by the National Capital Section of the American Institute of Aeronautics and Astronautics (AIAA) on October 15, 2004

On October 15, 2004, the National Capital Section of the AIAA will host a reception honoring Russian-U.S. Cooperation in aeronautics and space at the Russian Embassy, in Washington, D.C. The program will feature astronauts from Russia and the United States who will discuss their experiences as astronauts. It has been determined to be in the best interest of the Government for those NASA employees who are invited to the reception to attend in their official capacities and as representatives of NASA.

The event will be widely attended by officials from other Federal agencies, members of Congress and their staffers, representatives from the aerospace industry and various aerospace associations, and private law firms. The estimated cost, which includes all food and beverages, is \$50 per person. Approximately 250 people are expected to attend. The event will allow NASA employees the opportunity to discuss with other guests the various aspects of the astronauts program, experiences, and the Space Station. As such, I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I, therefore, conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Accordingly, NASA invitees and their spouses or guests may attend the reception hosted by the National Capital Section of the AIAA on October 15, 2004.

A handwritten signature in black ink, appearing to read "R. Andrew Falcon". The signature is stylized with a large, sweeping flourish at the end.

R. Andrew Falcon